



COMMONWEALTH of VIRGINIA

DEPARTMENT OF EDUCATION

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SNP Memo #2012-13-03

TO: Directors, Supervisors, and Contact Persons Addressed

FROM: Catherine Digilio Grimes, MS, RD, LDN, SNS
Director, School Nutrition Programs

A handwritten signature in black ink that reads "Catherine Digilio Grimes".

DATE: October 1, 2012

SUBJECT: Verification of Households' Eligibility for Free or Reduced Price Meals

Federal regulations governing the National School Lunch Program require school divisions to verify the eligibility of a sample of the total number of approved free and reduced price meal applications on file as of October 1 annually. The process is referred to as verification. This memorandum provides information required for the verification process to be conducted this year.

Timelines

- October 1, 2012 - The number of approved applications on file on October 1 (excluding previous year's applications carried over into the current year) must be used to calculate the required sample size. The Verification Summary Worksheet in the School Nutrition Program Web-based reporting system (SNPWeb) should be used to calculate or confirm the required number of applications that must be verified to meet the sample size.
- November 15, 2012 - Initial verification activities and processes must be completed.
- December 15, 2012 - Deadline for reporting the results of verification in SNPWeb.
- February 15, 2013 - The number of households terminated as a result of verification that reapply between November 15, 2012, and February 15, 2013, must be tracked along with the results of the reapplication.
- March 15, 2013 - Deadline for reporting the results of reapplication in SNPWeb.

Forms

Virginia Department of Education (VDOE) prototype verification forms (i.e., SNP200-220), including the required Racial/Ethnic Data Report, are posted on SNPWeb in *Online Forms*. School divisions should use these prototypes, if possible. If the division elects to use alternate verification forms, from their eligibility software or other sources, those forms must be updated annually to reflect all current required information from the VDOE prototype forms.

Sampling Method and Use of the Verification Summary Worksheet

The required basic sample size for verification is three percent of all approved applications on file as of October 1, or 3,000 applications, whichever is less. The law requires school divisions to draw the sample from error-prone applications. Error-prone applications are those that report total household income within \$100 monthly, or \$1,200 annually, of the income eligibility guidelines for free or reduced price meals for the applicable household size.

The Verification Summary Worksheet (Worksheet) found in SNPWeb is a tool designed to automatically calculate and display the required sample size based on the number of approved applications on file as of October 1. Data entered by the school division in questions 5 through 9 of the Worksheet will calculate the required number of applications to be verified and display the result in question 10. School divisions should enter the required data into the Worksheet on or immediately after October 1 to determine or confirm the number of applications to be verified to meet the required basic sample size.

Federal regulations specifically prohibit school divisions from verifying more than the required minimum sample size, with the exception of those applications verified for cause. If a household application selected to be verified as part of the original sample is subsequently determined to be withdrawn or otherwise ineligible prior to the completion of verification, the application must be replaced with a similar application to assure the required minimum sample size is met.

Verification Sample Confirmation Review

Prior to conducting verification, school divisions are required to conduct a confirmation review of all applications selected for verification. The purpose of the review is to check the accuracy or confirm the initial free or reduced price eligibility determination. An individual other than the one who made the initial eligibility determination must conduct the confirmation review. Documentation of the confirmation review and any resulting changes in eligibility status must be maintained.

If the initial determination is found to be incorrect, the school division must correct the household eligibility status and notify the household of the change in eligibility through a notice of adverse action letter. A sample letter is included in the VDOE prototype verification forms. If the correction results in the application no longer being eligible for verification, it must be replaced by another eligible application (i.e., a correctly approved application within \$100 of the monthly eligibility limit). After completing the confirmation review, school divisions may replace up to five percent of the applications selected in the verification sample. Any application removed from the sample pursuant to this provision must be replaced with a similar application. School divisions must consider specific factors, such as communication difficulties and household stability, when declining to verify selected applications. Upon completing the confirmation review, the division should proceed with verification of applications with confirmed eligibility and those with corrected eligibility that remain eligible for benefits, as well as those selected to replace incorrectly determined applications.

Follow-up Activities

Households selected for verification must be provided with a telephone number they may call for assistance. This phone number must be provided to the household in the notice of selection

letter. Prototype letters can be found in SNPWeb. The phone number must permit the call to be free for all households in the division. The division may provide different phone numbers for each local calling area within the school division or they may establish a toll-free number for households outside of the local calling area. This letter must also include the name of a school official(s) to act as a point of contact for the household either to directly assist them or to refer the caller to a specific person for help.

A second follow-up is required for households that fail to respond to the initial request for verification information. At least one attempt, through mail, by telephone, or personal contact must be made. Written documentation of the required second notification, including all follow-up attempts and the results, must be maintained. If the household's eligibility status cannot be verified after the follow-up attempt(s), the household's benefits must be terminated through a notice of adverse action letter.

Reapplication

After the initial verification process is completed on November 15, school divisions are required to track the number of households that were terminated as a result of verification and who reapply for benefits through February 15. Households that were terminated due to non-response to verification must provide documentation of their household income upon reapplication and this documentation and household size must be used to determine eligibility status. The number of these households that reapply through February 15 and the results of the reapplication (approved free, approved reduced, or denied) must be summarized and reported in the Worksheet after February 15 but no later than March 15. Other households terminated as a result of non-response to verification who reapply at any time during the school year they were selected for verification must meet all requirements of the verification process, including submission of documentation of all sources of household income. However, these re-applicant households are not reported in the worksheet if the process takes place after February 15.

Detailed verification guidance can be found in the USDA Eligibility Guidance Manual, revised August 2012, Part 8: Verification at <http://www.fns.usda.gov/cnd/Guidance/EliMan.pdf>.

If there are questions, please contact the school nutrition program specialist assigned to your division or Office of School Nutrition Programs staff at (804) 225-2074.

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